

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN ALLAN GRANGER,	:	
Plaintiff	:	CIVIL ACTION NO.
	:	
v.	:	
	:	
FIRST NATIONAL LAND TRANSFER, INC,	:	
and MICHAEL BORSO	:	
	:	Jury Trial Demanded
Defendants	:	

NOW COMES the Plaintiff, John Allan Granger, a/k/a John Granger (hereinafter, "Plaintiff" or "Granger") by and through his attorney, David C. Najarian, with Plaintiff's Complaint against Defendants, First National Land Transfer, Inc and Michael Borso, (collectively, the "Defendants"), and upon information and belief, avers as follows:

COMPLAINT

1. Plaintiff, John Allan Granger, is an adult individual having an address at 2669 Shillington Road, Suite 223, Sinking Spring, Berks County, Pennsylvania 19608.

2. Defendant, First National Land Transfer Inc (hereinafter, "FNLTI"), is a corporation or entity organized under the laws of the Commonwealth of Pennsylvania having a principle business address or headquarters at 2573 Somerset Rd, Whitehall, PA 18052.

3. Defendant FNLTI is principally engaged in the business of providing title insurance and real estate services to persons residing or owning property in Pennsylvania, New Jersey Maryland, Florida, Virginia and elsewhere.

4. Defendant Michael Borso is an adult individual, founder, owner, president and/or CEO of FNLT and individually directs controls and ratifies the actions of the Defendant FNLT; Defendant Borso maintains a residence and office at FNLT's address of 2573 Somerset Rd. Whitehall, PA 18052, and is in all contexts, the alter ego of Defendant FNLT.

5. Defendants FNLT and Michael Borso (collectively, the Defendants) are the owners of the domain and website situate at <http://www.useflnt.com>, (hereinafter, the FNLT website); and at all times, have control over, and the right to control, the domain, website and contents thereof.

6. To wit, the Defendants developed, designed, maintained, commissioned, placed and oversaw the creation of world wide web pages for use on the FNLT website, which advertise the title insurance and real estate services offered by the Defendants.

JURISDICTION AND VENUE

7. This action arises under the Federal Copyright Act of 1976, as amended, 17 U.S.C. §101, et seq., (hereinafter, "Act") and the Lanham Trademark Act at Sec. 43a, 15 U.S.C. 1125(a), (hereinafter, "Lanham Act").

8. Jurisdiction is founded on Sections 1331, 1338(a) and 1338(b) of the Judicial Code (28 U.S.C. §§ 1331, 1338(a) and 1338(b)).

9. State claims herein are substantially related to Defendant's infringement on John Granger's copyrights and pursuant to § 1338(b) of Title 28 of the United States Code and the court has pendent jurisdiction of this claim.

10. Venue is conferred by § 1391(b)(2) and (c) and 1400(a) of the Judicial Code (28 U.S.C. §1391(b)(2) and (c) and 1400(a)).

OPERATIVE FACTS

11. Plaintiff, John Granger is engaged in the business, inter alia, of designing, manufacturing, authoring and/or licensing computer software, computer programs and related services for use by professionals in the real estate industry, and more specifically, designing, authoring and licensing computer programs for use on the Internet's World wide web (hereinafter "Web") by agents offering real estate title insurance.

12. In 1997, Plaintiff created and authored an original work, a computer program, titled and known as "Pennsylvania Title Insurance Rate Calculator" which provided, calculated and/or estimated the rate or cost of real estate title insurance offered by title insurance agents selling real estate title insurance in the State of Pennsylvania.

13. In 2002, Plaintiff amended, altered and recreated said work so as to reflect and update the title insurance rates then charged by agents in Pennsylvania. This is the work at issue, a display of which is attached and incorporated hereto as Exhibit "A".

14. Computer programs, such as the Plaintiff's Pennsylvania Title Insurance Rate Calculator is copyrightable subject matter under the laws of the United States.

15. On or about January 1, 2002, Plaintiff placed the Pennsylvania Title Insurance Rate Calculator on an internet web page, namely, <http://www.alphaadv.net/patitle/ratecalc.html>, as a product sample or advertisement offered for sale or use under license to title insurance agents and similar real estate industry professionals.

16. Plaintiff, as author and owner of said computer program, the literary work known as the Pennsylvania Title Insurance Rate Calculator, registered the same effective October 2, 2006 with the United States Copyright Office, and thereby complied in all

respects with the registration and deposit requirements of the Act. Proof of said registration is attached and incorporated hereto as Exhibit "B".

17. Plaintiff legally owns the design, i.e., the computer source code which comprises said computer program, namely the Pennsylvania Title Insurance Rate Calculator, the exclusive copyrights therein, and is entitled to copyright protection.

18. Plaintiff manufactured and licensed computer software or programs using the computer program at issue to numerous persons or firms within the real estate title insurance industry.

19. Additionally, Plaintiff uses his Pennsylvania Title Insurance Rate Calculator to promote his own professional endeavors which include selling and/or offering automation products and services to title insurance agents and firms.

20. Plaintiff's copyright ownership is noticed on all sample programs and products wherein the Pennsylvania Title Insurance Rate Calculator is contained. All such products are marked with a notice of John Granger's copyright ownership of the Title Insurance Rate Calculator.

21. Plaintiff, Granger further incorporated certain additional and/or embedded protective features within his Title Insurance Rate Calculator so as to prevent or inhibit unauthorized infringement of said Title Insurance Rate Calculator.

22. Said features included, inter alia, external copyright notices, e.g. "Copyright 1997 – 2002 by John Granger", and "All Rights Reserved".

23. Said features further included notices embedded in the internal source code of said Title Insurance Rate Calculators exemplar of the following:

// http://alphaadv.net/patitle/ratecalc.js
// Pennsylvania Title Insurance Rate Calculator -->

*// Thank you for finding this page interesting enough to view the source code.
-->
// Please respect my copyrights. Thankx -->
// Page written October 17, 1997, Last update May 1, 2006 -->*

∴ Changing the lines below is an invitation to Adventures in Legal Land -->

24. Said features included internal copyright management, in part, containing specialized source code, aptly called a cloaking device, so as to prevent unauthorized infringement of any kind:

*!-- Activate Cloaking Device
...
<!-- Deactivate Cloaking Device -->*

25. Plaintiff has expended his own resources in authoring, designing, promoting, manufacturing, selling and licensing his Pennsylvania Title Insurance Rate Calculator and built a valuable business based on demand for his Rate Calculator and like products. John Granger has become identified in the minds of the public as the provider of the same.

26. At all relevant times, the Defendants maintained, purchased, commissioned, caused to be made, and/or advertised their services on an internet web page having a Uniform Resource Locator (URL) at <http://www.usefnlt.com>, so as to market, sell, advertise and publicize the services of FNLT to the general public.

27. At all relevant times, the domain name, [usfnlt.com](http://www.usfnlt.com), was under the direct and apparent control and right of control by FNLT and Michael Borso; To wit, upon information and belief, said web site was registered and owned by said Defendants.

28. FNLT and/or Michael Borso placed, or caused to be placed an infringing Pennsylvania Title Insurance Rate Calculator on the web site for the Defendant FNLT at <http://www.usefnlt.com>. Said infringing version is hereafter referred to as "FNLT's

Pennsylvania Title Insurance Rate Calculator”. An exemplar display of said infringing work is attached and incorporated hereto as Exhibit ‘C’ (a display of the infringing Pennsylvania Title Insurance Rate Calculator).

29. So too, the Defendants placed, or caused to be placed infringing Rate Calculators offering title insurance in the states of Maryland, Florida, New Jersey and Virginia, all of which are believed to infringe upon the Plaintiff’s copyright for his Pennsylvania Title Insurance Rate Calculator and/or are derivative works from the Plaintiff’s aforesaid Pennsylvania Rate Calculator. See Exhibit ‘D’ (collective displays of the infringing derivative works).

30. Said infringing and/or derivative insurance rate calculators provided title insurance quotes for title insurance policies sold by Defendant FNLT.

31. Likewise the Defendants caused to be placed certain closing costs rate calculators on FNLT’s website;

32. The Plaintiff’s believes and therefore avers, based upon the Defendant’s access and use of the Plaintiff’s Pennsylvania Title Insurance Rate Calculators, said closing costs calculators are derivative works from Plaintiff’s Pennsylvania Title Insurance Rate Calculator.

33. On or about March 6, 2008, Plaintiff discovered the infringing works then appearing on Defendant FNLT’s website.

34. On or about March 10, 2008, Plaintiff requested that Defendant FNLT supply a copy of its licensing agreement to legally use Plaintiff’s copyrighted works. Plaintiff contends that no such license agreement between Plaintiff and Defendants exists. A copy of said communication is attached hereto as ‘E’.

35. To wit, the Plaintiff received no response to his letter of March 10, 2008, however it is believed that upon some unknown date said infringing title insurance rate calculators were removed from the subject website. However the closing costs rate calculators remained on the subject website.

36. Whereupon on or about April 21, 2008, by Plaintiff sent Defendant FNLT a written Notice of Acknowledgement of Use of Copyrighted Material without license, a copy of which is attached hereto as Exhibit 'F' .

37. Said Defendants were never authorized to use Plaintiff's Pennsylvania Title Insurance Rate Calculator and/or the derivative infringing work(s) then appearing on the Defendants' website.

38. Certain internal copyright management code i.e. that pertaining to a purported source code cloaking device, in Plaintiff's Rate Calculator was removed from the Defendants' infringing works.

39. Plaintiff's external copyright notices: "Copyright 1997 – 2002 by John Granger" and "All Rights Reserved" were removed from infringing works and replaced with notices which claimed copyright and ownership in the works by FNLT.

40. Plaintiff's internal copyright notices were retained in the source code of Plaintiff's Pennsylvania Title Insurance Rate Calculator then found on the FNLT website but were removed other infringing derivative works then also found on the FNLT website.

COUNT ONE - COPYRIGHT INFRINGEMENT (Pennsylvania Rate Calculator)

John Allan Granger

v.

First National Land Transfer Inc., and Michael Borso

41. The foregoing paragraphs are hereby incorporated herein as though fully set forth

herein.

42. The Defendants unlawfully and willfully copied all or part of Plaintiff. John Granger's Pennsylvania Title Insurance Rate Calculator in violation of Plaintiff. Granger's copyright in the computer program.

43. The Defendants copied Plaintiff John Granger's Pennsylvania Insurance Rate Calculator and used the same on the website for Defendant FNLT, and did so without authorization from the copyright holder as required under the Act. See, 17 USC 106, 501.

44. The FNLT Pennsylvania Rate Calculator found at Exhibit 'C' of this Complaint infringes John Granger's copyright in the Pennsylvania Title Insurance Rate Calculator at Exhibit 'A'.

45. The source code comprising Defendants' Pennsylvania Rate Calculator at Exhibit 'C' is substantially similar, nearly identical, to the source code or literary work comprising the Plaintiff's copyrighted material.

46. By way of example, the roundit function in FNLT's Pennsylvania Title Insurance Calculator contained the exact same variable declaration, a component of the Plaintiff's cloaking device, also used in the roundit function contained in Granger's Pennsylvania Title Insurance Rate Calculator.

var uscal7etseq = "True";

47. By way of further example, FNLT's Pennsylvania Title Insurance Rate Calculator contained Plaintiff's primary internal Pennsylvania Copyright Management Information.

*// http://alphaadv.net/patitle/ratecalc.js
// Pennsylvania Title Insurance Rate Calculator -->
// Thank you for finding this page interesting enough to view the source code. -->
// Please respect my copyrights. Thankx -->
// Page written October 17, 1997, Last update May 1, 2006 -->*

// Changing the lines below is an invitation to Adventures in Legal Land -->

48. However, Plaintiff's external copyright notices: "Copyright 1997 – 2002 by John Granger" and "All Rights Reserved" were removed from the infringing Pennsylvania rate calculator.

49. Likewise, the Plaintiff's cloaking device was removed from the infringing Pennsylvania Rate calculator.

50. The Defendants' Pennsylvania Rate calculator uses and infringes the compilation as compiled and arranged by Plaintiff in John Granger's copyrighted work.

51. The Defendants' Rate calculator uses and infringes the extraction of data as authored and arranged by John Granger in John Granger's copyrighted work.

52. Plaintiff has lost revenue from Defendants' unlawful and willful copying of John Granger's copyrighted material.

53. Defendants' Pennsylvania Rate Calculator dilutes the market and serves to destroy the distinctiveness of John Granger's copyrighted works.

54. Defendants' copying of Plaintiff's Pennsylvania Title Insurance Rate Calculator and the use of the same on the Defendants' web page destroys the public's identification of the Pennsylvania Title Insurance Rate Calculator to John Granger as John Granger's exclusive property, thereby confusing the public and causing John Granger to suffer irreparable damages and lost profits.

55. John Granger's sale of his own works and derivative works is prejudiced by Defendants' copyright infringements.

56. The Plaintiff demands damages as may be available at law under the count hereunder and per act of infringement as either (1) actual damages and any additional

profits of the infringer; or (2) statutory damages as determined by the court for a sum of not less than \$750 nor more than \$30,000, or in the case of willful infringement, as alleged herein, a sum not more than \$150,000, together with costs, interest and attorney's fees.

COUNT TWO - COPYRIGHT INFRINGEMENT (Derivative Works)

John Allan Granger

v.

First National Land Transfer Inc., and Michael Borso

57. The foregoing paragraphs are hereby incorporated herein as though fully set forth herein.

58. The Defendants unlawfully and willfully copied all or part of Plaintiff, John Granger's Pennsylvania Title Insurance Rate Calculator in violation of Plaintiff. Granger's copyright in the computer programs.

59. To wit, Plaintiff avers that the title insurance rate calculators including those for the States of Maryland, Virginia, Florida and New Jersey as well as the closing cost calculators then appearing on the Defendant's website are derivative infringing works comprising portions of Plaintiff's copyrighted Pennsylvania Title Insurance Rate Calculator.

60. The Defendants used the aforesaid infringing and derivative works on the website for FNLT, and did so without authorization from the copyright holder as required under the Act. See, 17 USC 106, 501.

61. FNLT's derivative rate calculators and closing costs calculators infringe John Granger's copyright in his Pennsylvania Title Insurance Rate Calculator.

62. Plaintiff has lost revenue from Defendants' unlawful and willful copying of John Granger's copyrighted material.

63. Defendants' rate calculators dilute the market and serves to destroy the distinctiveness of John Granger's copyrighted works.

64. Defendants' copying and usurping the Plaintiff's Pennsylvania Title Insurance Rate Calculator and the use of the same on the Defendants' web page destroys the public's identification of the Pennsylvania and other state Title Insurance Rate Calculators to Plaintiff as John Granger's exclusive property, thereby confusing the public and causing Plaintiff to suffer irreparable damages and lost profits.

65. John Granger's sale of his own works and derivative works is prejudiced by Defendants' copyright infringements.

66. The Plaintiff demands damages as may be available at law under the count hereunder and per act of infringement as either (1) actual damages and any additional profits of the infringer; or (2) statutory damages as determined by the court for a sum of not less than \$750 nor more than \$30,000, or in the case of willful infringement, as alleged herein, a sum not more than \$150,000, together with costs, interest and attorney's fees.

COUNT THREE - UNFAIR COMPETITION – LANHAM ACT
John Allan Granger

v.

First National Land Transfer Inc., and Michael Borso

67. The foregoing paragraphs are hereby incorporated herein as though fully set forth herein.

68. Defendants, in unlawfully and willfully copying John Granger's Pennsylvania Title Insurance Rate Calculator, and using the derivatives therefrom, and in intentionally removing the internal and external notices which attributed Plaintiff as the source of said Rate Calculator and works thereof, and in fraudulently placing the name of FNLT as the source and copyright owner of said rate calculator and works, created a likelihood of confusion among the public as to the original source of such works, and have contributed to the dilution of the distinctive quality of John Granger's works in the marketplace.

69. By removing Plaintiff's copyright information, and placing the work under the name and domain of First National Land Transfer Inc, and by labeling the work with a false copyright owned by FNLT, the Defendants, each of them, misappropriated and conspired to misappropriate the Plaintiff's goods as their own, and thereby engaged in acts of unfair competition under the Lanham Act at 15 U.S.C. 1125(a).

70. By using the misappropriated work as their own, the Defendants, each of them, affected interstate commerce, and thereby engaged in unfair competition under the Lanham Act at 15 U.S.C. 1125(a).

71. The Defendants by their unauthorized appropriation and misappropriation and use of John Granger's copyrighted works, engaged in acts of unfair competition, unlawful appropriation, unjust enrichment, wrongful deception of the purchasing public, and unlawful trading on John Granger's good will and the public's acceptance of John

Ganger's copyrighted work, all to John Granger's irreparable damage.

72. To wit, the Plaintiff seeks actual damages sustained by the Plaintiff, resulting profits of the Defendants, together with costs, interest, attorney's fees and such punitive damages as the Court may deem appropriate.

COUNT FOUR - UNFAIR COMPETITION – STATE CLAIM

John Allan Granger

v.

First National Land Transfer Inc., and Michael Borso

73. The foregoing paragraphs are hereby incorporated herein as though fully set forth herein.

74. By willfully engaging fraudulent and/or deceptive practices within the commerce of Pennsylvania, misappropriating or passing off the Plaintiff's goods as their own, and thereby causing a likelihood of confusion in the marketplace, the Defendants engaged in unfair competition as recognized under the laws adopted or duly enacted by the Commonwealth of Pennsylvania. See, e.g., 73. P.S. 201-2

75. Defendants, each of them, by their unauthorized appropriation and misappropriation and use of John Granger's copyrighted works, engaged in acts of unfair competition, unlawful appropriation, unjust enrichment, wrongful deception of the purchasing public, and unlawful trading on John Granger's good will and the public's acceptance of John Ganger's copyrighted work, all to John Granger's irreparable damage.

76. To wit, the Plaintiff seeks actual damages sustained by the Plaintiff, resulting profits of the Defendants, together with costs, interest, attorney's fees and such punitive damages as the Court may deem appropriate.

**COUNT FIVE – CIRCUMVENTION OF COPYRIGHT PROTECTION
SYSTEMS**

John Allan Granger

v.
First National Land Transfer Inc., and Michael Borso

77. The foregoing paragraphs are hereby incorporated herein as though fully set forth herein.

78. Plaintiff John Granger avers that the Defendants, each of them, committed not less than four separate, distinct and intentional acts, each of which comprise a violation for the removal or circumvention of copyright protection systems under 17 U.S.C. 1201.

79. Said separate, distinct and intentional circumventions committed by the Defendants as to the Pennsylvania Rate Calculator included the following:

- a. in removing the Plaintiff-author's name from the internal source code in the subject computer program;
- b. in removing the external copyright notices: "Copyright 1997 – 2002 by John Granger" from the literary work in question;
- c. in removing Plaintiff Granger's external notice "All Rights Reserved Notice" from the literary work in question;
- d. in removing Plaintiff's internal copyright management, in part, the cloaking device, which was designed to prevent unauthorized infringement of any kind:

!-- Activate Cloaking Device

<!-- Deactivate Cloaking Device -->

80. The collective Defendants further committed the same separate, distinct and intentional circumventions committed as to Plaintiff's Pennsylvania Title Insurance Rate Calculator in their derivative works however with the additional act of having removed Plaintiff's internal copyright notice as outlined below:

// http://alphaadv.net/patitle/ratecalc.js

// Pennsylvania Title Insurance Rate Calculator -->

// Thank you for finding this page interesting enough to view the source code. -->

Please respect my copyrights. Thankx -->

Page written October 17, 1997, Last update May 1, 2006 -->

Changing the lines below is an invitation to Adventures in Legal Land -->

81. The aforesaid acts each separately constitute separate violations under 17 U.S.C. 1201.

82. The Defendants acted and conspired to circumvent said copyright protection without the authority of the copyright owner.

83. The Defendants acted and conspired to circumvent the aforesaid copyright protection with the intent to enable, induce, facilitate or conceal infringement(s).

84. In so circumventing the copyright protection from the Plaintiff's work, the Defendants knew or should have known that so doing would induce, enable, facilitate, or conceal the infringement(s) of the copyright.

85. Defendants' conduct resulted in lost profits, diminished good will, and similar irreparable damage to Plaintiff.

86. The Plaintiff is entitled to damages under the count hereunder as either (1) actual damages and any additional profits of the infringer; or (2) statutory damages as determined by the court for a sum of not less than \$200 or more than \$2,500, per each act of circumvention, together with costs, interest and attorney's fees.

**COUNT SIX – INTEGRITY OF COPYRIGHT INFORMATION -
John Allan Granger**

v.

First National Land Transfer Inc., and Michael Borso

87. The foregoing paragraphs are hereby incorporated herein as though fully set forth herein.

88. Plaintiff John Granger avers that the Defendants committed not less than five separate, distinct and intentional acts, each of which comprise a violation arising from the integrity of copyright information under 17 U.S.C. 1202.

89. As to the Plaintiff's Pennsylvania Title Insurance Rate Calculator, said separate, distinct and intentional acts involving the integrity of copyright information, as knowingly and willfully committed by the Defendants under 17 U.S.C. 1202, included the following:

- a. in removing the external copyright notices: "Copyright 1997 – 2002 by John Granger" from the literary work in question;
- b. in removing Plaintiff, Granger's external notice "All Rights Reserved Notice" from the literary work in question;
- c. in removing Plaintiff Granger's name as author from the source code of the program;
- d. in adding the external notice, "2006 First National Land Transfer© All Rights Reserved"; and
- e. in distributing and causing to be distributed, the work at issue knowing that said copyright information was false.

90. The collective Defendants further committed the same separate, distinct willful and intentional acts involving the integrity of copyright information as to the derivative works however with the addition of having removed John Granger's internal notice as set forth below:

```
// http://alphaadv.net/patitle/ratecalc.js
// Pennsylvania Title Insurance Rate Calculator -->
// Thank you for finding this page interesting enough to view the source code. -->
// Please respect my copyrights. Thankx -->
```


// Page written October 17, 1997, Last update May 1, 2006 -->

“ Changing the lines below is an invitation to Adventures in Legal Land -->

91. The Defendants acted and conspired to alter the integrity of the aforesaid copyright information without the authority of the copyright owner.

92. The Defendants acted and conspired to alter the integrity of the aforesaid copyright information with the intent to enable, induce, facilitate or conceal infringement.

93. In altering the integrity of the aforesaid copyright information from the Plaintiff's work, the Defendants, each of them, knew or should have known that so doing would induce, enable, facilitate, or conceal the infringement(s) of copyright.

94. Defendants' conduct resulted in lost profits, diminished good will and similar irreparable damage to Plaintiff.

95. The Plaintiff is entitled to damages under the count hereunder as either (1) actual damages and any additional profits of the infringer; or (2) statutory damages as determined by the court for a sum of not less than \$2500 nor more than \$25,000 per each violation, together with costs, interest and attorney's fees.

WHEREFORE, PLAINTIFF DEMANDS:

A. Defendants be enjoined during the pendency of this action and permanently thereafter from appropriating and using John Granger's copyrighted works;

B. Defendants be enjoined during the pendency of this action and permanently thereafter from selling or delivering its infringing rate calculator and derivative works to the public;

C. Defendants be held jointly and severally liable to the extent permitted by law;

D. Defendants be ordered to pay to John Granger all damages suffered by John

Granger due to their unlawful acts, with prejudgment interest, as well as account for and pay to John Granger all gains and profits that they have enjoyed at John Granger's expense (or in the alternative, such applicable statutory damages as the Plaintiff may elect) and that such damages include John Granger's costs and attorney's fees. At present, John Granger cannot ascertain the full extent of his damages and lost profits:

E. such other relief as the equities of the case may require and as this Court may deem just and proper under the circumstances; and

F. a trial by jury.

Respectfully submitted,

Respectfully submitted,

BY: 

DAVID C. NAJARIAN, ESQUIRE

I.D. #86606

Attorney for Plaintiff

55 96 Donats Peak Rd

Kempton, PA 19529

610-756-3149

610-616-5637 Fax

Email: dave@lehighlegal.com

DATE: 3/1/11


Pennsylvania Title Insurance Rate Calculator

These are the all-inclusive title insurance rates for the member companies of the Title Insurance Rating Bureau of Pennsylvania as approved by the Pennsylvania Insurance Department. These rates became effective March 1, 1995, and were amended January 1, 2002 and May 1, 2006.

Enter the Amount of Insurance and press the **Tab** key

Amount of Insurance	Basic	Reissue	New Construction	Refinance 0 - 2 years	Refinance 2 - 4 years	
						Reset

NEW [Pennsylvania Good Faith Estimate Calculator](#) NEW

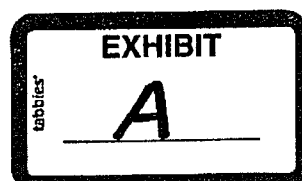
This page has been accessed  times since January 1, 2000
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[Add the Pennsylvania Title Insurance Rate Calculator to your Web Site](#)

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[Search Public Records with WebInvestigator.org](#)



[Return to the Pennsylvania Title Insurance Web Page](#)



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form TX

For a Non-dramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

REG.

TXu1-305-577



DATE OF DEPOSIT OF MATERIALS IN OFFICE

EFFECTIVE DATE OF REGISTRATION

Oct 2 2006

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK **Pennsylvania Life Insurance Rate Calculator**

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION: If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial, give: Volume Number First Date Last Date

2

NAME OF AUTHOR **John Allan Granger**

DATES OF BIRTH AND DEATH

Year Born 1959 Year Died

Was this contribution to the work made for hire?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country: USA
OR
Citizen of: USA
OR
Domiciled in: USA

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

NOTE

Under the law, the author of a work made for hire is generally the employer, not the employee. For any part of this work that was made for hire, check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP: Briefly describe the nature of material created by this author in which copyright is claimed.

Computer program

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work made for hire?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country:
OR
Citizen of:
OR
Domiciled in:

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

NATURE OF AUTHORSHIP: Briefly describe the nature of material created by this author in which copyright is claimed.

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work made for hire?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country:
OR
Citizen of:
OR
Domiciled in:

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

NATURE OF AUTHORSHIP: Briefly describe the nature of material created by this author in which copyright is claimed.

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2002

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information: Month Day Year

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. **John Allan Granger**

2820 Audubon Village Drive, Suite 339

Audubon, Pennsylvania 19403

TRANSFER: If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED

OCT 02 2006

ONE DEPOSIT RECEIVED

OCT 02 2006

TWO DEPOSITS RECEIVED

OCT 02 2006

THREE DEPOSITS RECEIVED

OCT 02 2006

FOUR DEPOSITS RECEIVED

OCT 02 2006

MORE ON BACK

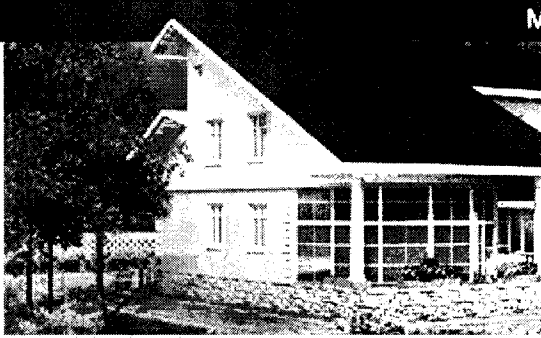

Complete all applicable sections of this form.

EXHIBIT

B

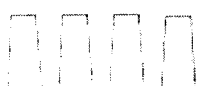
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Page 1 of 2



HOME SERVICES ABOUT US RESOURCES AFFILIATES

Sub Menu



ORDER YOUR TITLE
order online now
fax order form

Calculators

Closing Costs Calculator

Title Insurance Only Calculators

Reset

PENNSYLVANIA TITLE INSURANCE CALCULATOR

These are the all-inclusive title insurance rates for the member companies of the Title Insurance Rating Bureau of Pennsylvania as approved by the Pennsylvania Insurance Department; rates became effective March 1, 1995, and were amended May 1, 2006.

Enter the Amount of Insurance and press the TAB key.

Loan Amount:

PA Enhanced:

PA Reissue:

PA Substitution:

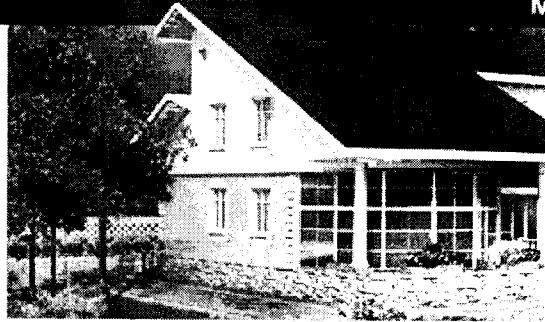
New Construction:

Refinance 0-2 yrs:

Refinance 2-4 yrs:

HOME SERVICES ABOUT US RESOURCES AFFILIATES CONTACT MEMBER LOGIN

"C"



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[Sub Menu](#)

VIRGINIA TITLE INSURANCE CALCULATOR

These are the all-inclusive title insurance rates for the member companies of the Title Insurance Rating Bureau of Virginia as approved by the Virginia Insurance Department.

Enter the Amount of Insurance and press the TAB key.

ORDER YOUR TITLE

[order online now](#)

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[Closing Costs Calculator](#)

[Title Insurance Only
Calculators](#)

Loan Amount:

VA Basic:

VA Reissue:

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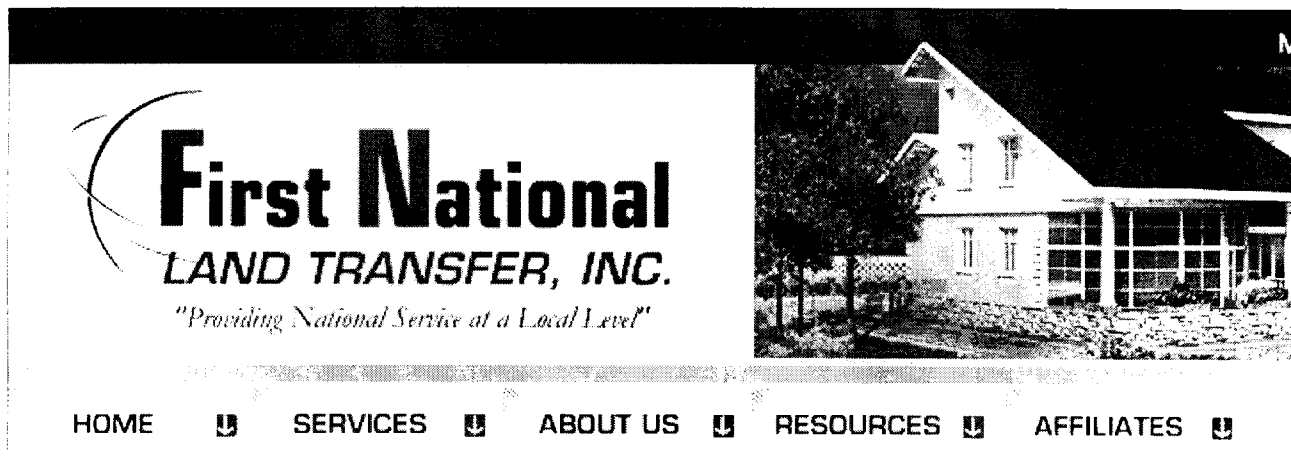
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"D"



FLORIDA TITLE INSURANCE CALCULATOR



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These are the all-inclusive title insurance rates for Florida as approved by the Florida Department of Insurance. These rates became effective January 1, 2002. While all fees are intended to be accurate, they should be used for estimation purposes only.

Enter the Amount of Insurance (without comma's) and press the TAB key.

Loan Amount:

FL Rate:

FL Reissue:

Reset

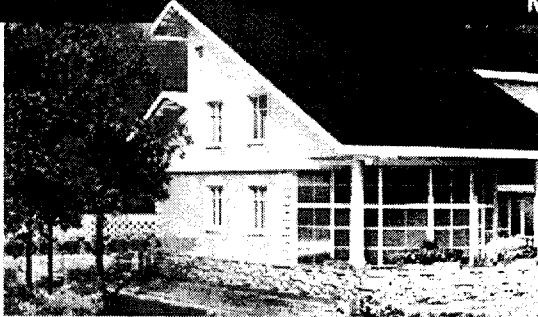

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MARYLAND TITLE INSURANCE CALCULATOR

These are the all-inclusive title insurance rates for the member companies of the Title Insurance Rating Bureau of Maryland as approved by the Maryland Insurance Department.

The Enhanced Rate includes the an additional \$75 as instructed by state licensed under

Enter the Amount of Insurance and press the TAB key.

Loan Amount:

MD Enhanced:

Reset

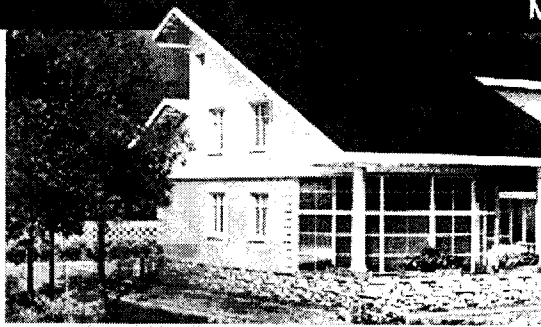
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NEW JERSEY TITLE INSURANCE CALCULATOR

These are the all-inclusive title insurance rates for the member companies of the Title In Rating Bureau of New Jersey as approved by the New Jersey Insurance Department. TI became effective January 7, 2002.

Enter the Amount of Insurance and press the **TAB** key.

Loan Amount:

NJ Basic:

NJ Reissue:

NJ Substitution:

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John Granger

2820 Audubon Village Drive, Suite 339
Audubon, Pennsylvania 19403
<http://www.alphaadv.net/patitle>
(610) 929-5154 **John@alphaadv.net**

March 10, 2008

FIRST NATIONAL LAND TRANSFER
2573 Somerset Road
Whitehall, Pennsylvania 18052

Contract #: _____

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It has come to the attention of John Granger that FIRST NATIONAL LAND TRANSFER is operating a website found at URL'S:

<http://usefnlt.com/title-insurance-pennsylvania.php>
<http://usefnlt.com/title-insurance-new-jersey.php>
<http://usefnlt.com/title-insurance-maryland.php>
<http://usefnlt.com/title-insurance-florida.php>
<http://usefnlt.com/title-insurance-virginia.php>
<http://usefnlt.com/hud1.php>

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Very truly yours,

John Granger

“ E ”

John Granger

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<http://www.alphaadv.net/patitle>

(610) 929-5154

John@alphaadv.net

April 21, 2008

FIRST NATIONAL LAND TRANSFER

Contract #: _____

2573 Somerset Road

Whitehall, Pennsylvania 18052

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Very truly yours,

" F "

John Granger